> number of people who's available and will they want to show
> up or not. They just don't show up. In Illinois we have had --
> I mean you're looking at the three companies or four that show
> up.

(Tr. 115-16)

SBC/Ameritech will likely argue that a single CLEC should not be able to prevent an OSS change from being made. This argument is specious. In the event a single CLEC objects to a change, all qualified CLECs would have the opportunity to vote on that change. If at least a majority of qualified participating CLECs are in favor of the change, the single CLEC cannot prevent it from occurring. (Tr. 113-15) Thus, the problem SBC/Ameritech suggests cannot occur.

SBC/Ameritech will also likely argue that the OIS vote is not as significant as the CLECs contend because the Change Management Process allows all CLECs to participate in discussions regarding OSS changes. Contrary to SBC/Ameritech's claim, the Change Management Process is not a sufficient vehicle for CLECs to oppose OSS changes that could adversely affect their ability to provide service in Illinois, and Staff agrees. (Staff Initial Comments, Staff Ex. 2, p. 14) That is because problems resulting from a change may not be apparent until testing of the change is complete. Testing occurs after conclusion of the Change Management Process. Thus, while a CLEC may have been involved with discussions regarding a change in the Change Management Process and may not have expressed any objection to the planned change at that time, it may only become apparent after testing that the proposed change is somehow flawed. (Tr. 98-99, 102-05) The only opportunity the CLEC would then have to oppose the change -- once the CLEC becomes aware of the problem -- would be the OIS vote. (Id.) Thus, the ability

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to participate in an OIS vote is critical to every CLEC in Illinois and the Change

Management Process is not an alternative to OIS voting.

The Commission must ensure that a clearly defined and fair change management

process is implemented so that CLECs have the ability to register objections to the

massive changes to Ameritech's OSS that have been proposed and are scheduled for

implementation. Staff supports the Joint Small CLECs' position that the OIS vote should

be democratic, without any voting minimum. As Staff stated: "a majority decision of the

qualified CLECs who choose to participate in such vote should be mandated rather than

a quorum-oriented procedure." (Staff Initial Comments, Staff Ex. 2, p. 14) The

Commission should approve this previously agreed upon voting process as the permanent

Illinois change management process.

Disputed Issue 6:   **Hours of System Availability**

Statement of Issue: **Hours of system availability are those hours that Ameritech can guarantee OSS will be in operation and available for use by the CLECs. The CLECs take the position that there is a substantial gap between the available hours of the pre-ordering and ordering systems. CLECs need uniformity in the hours of operation among the pre-ordering and ordering systems because the pre-ordering functions support ordering capability.**

**Competitive
Ramifications:**   **A truly competitive market will allow CLECs to make the decision when to serve their customers, regardless of how SBC/Ameritech decides to serve its retail customers. It is imperative that CLECs have the ability to place and process customer orders in a timely manner. Ameritech's current pre-ordering system availability hours prevent CLECs from performing necessary functions to process customer orders, which directly and negatively impacts a**

CLEC's ability to provide service to their customers in a timely, reliable and efficient manner. The current hours of availability force CLECs to mimic Ameritech's inefficient practice of not processing pre-orders, and consequently orders, on Sunday.

Currently, SBC/Ameritech does not offer synchronized hours of pre-order and order availability. The hours of availability for the interface that allows CLECs to access pre-order functionality are: Monday through Friday, 6:00 a.m. to 10:00 p.m.; and Saturday, 7:00 a.m. to 10:00 p.m. The pre-ordering interface is not available to CLECs on Sunday. (Tr. 206) The hours of availability for the interface that allows CLECs to access ordering functionality are Monday through Sunday, 6:00 a.m. to 1:00 a.m. (WorldCom Initial Comments, WorldCom Ex. 1, Attachment A) Thus, there is a substantial gap between the availability of the pre-ordering and ordering systems. In addition, SBC/Ameritech offers limited availability for trouble administration, maintenance and repair. The hours of availability for the Electronic Bonding Trouble Administration system ("EBTA"), which provides access to maintenance and repair functions, are twenty-four hours a day, seven days a week, except from 12:00 a.m. to 4:00 a.m. on Sundays and 10:30 p.m. to 11:30 p.m. Monday through Friday. There is also a down window between 12:00 a.m. and 2:30 a.m. for mechanized loop testing. (Tr. 219)

CLECs require uniformity in the hours of operation of the pre-ordering and ordering systems because the pre-ordering functions support ordering capability. Without pre-ordering functionality, CLECs are unable to cure rejected orders based on incorrect address validations. CLECs are also unable to reserve telephone numbers and due dates without access to pre-ordering functionality. (Tr. 204) Thus, the restricted availability of

the pre-ordering interface directly impacts a CLEC's ability to provide service to customers in a timely, reliable and efficient manner. (WorldCom Initial Comments, WorldCom Ex. 1, p. 7) In addition, CLECs require greater access to report repair and maintenance problems. For example, CLECs need to be able to submit a trouble ticket in the middle of the night if that is when a problem occurs. (Tr. 219)

Other ILECs have successfully demonstrated that an around-the-clock system of OSS availability is possible. Verizon and BellSouth have OSS availability hours on Saturday and Sunday. Verizon's down time for maintenance and repair is preset. BellSouth's Network Reliability Center is manned 24 hours a day, seven days a week. SWBT, Ameritech's affiliate, also offers pre-order hours on Sunday. (Staff Initial Comments, Staff Ex. 2, p. 18) These facts demonstrate that SBC/Ameritech should be able to offer greater hours of availability.

SBC/Ameritech claims that its back-end systems that support pre-ordering, ordering, maintenance and repair for both wholesale and retail service were not designed and built to provide continuous availability. (Amer. Initial Comments, Amer. Ex. 15, p. 26) This claim in nothing more than an admission that SBC/Ameritech's back-end systems are outdated. SBC/Ameritech expert Ms. Cullen agreed that most businesses are moving towards providing service accessible on an electronic basis twenty-four hours a day, seven days a week. (Tr. 231) SBC/Ameritech is obviously out of step with current industry trends. Indeed, Verizon will be providing Illinois CLECs access to its pre-order, order and trouble administration/maintenance and repair systems twenty-four hours a day, seven days a week, with one or two hours of maintenance down-time per system per month. (WorldCom Initial Comments, WorldCom Ex. 1, p. 6) SBC/Ameritech should no longer be

allowed to operate in a pre-21st century manner when doing so adversely affects competition.

Since this arbitration began, SBC/Ameritech has decided to open a pre-ordering maintenance window on Sundays. (Tr. 214-15) This decision, however, has not been formally announced nor has SBC/Ameritech provided any details regarding the proposed pre-ordering maintenance window. Indeed, it has not yet stated when it will produce such information. (Tr. 215-16) Apparently, SBC/Ameritech is in the process of investigating how to implement this change, but this investigation is not expected to be complete for another six to eight weeks. (Tr. 223) In effect, SBC/Ameritech has not offered any concrete solution to the concerns raised by CLECs.

The Commission should order SBC/Ameritech to provide extended hours of operation for its pre-ordering and ordering systems . Specifically, the Commission should order SBC/Ameritech to provide access to pre-order and maintenance and repair systems twenty-four hours a day, seven days a week, allowing for two hours a month during off-hours for maintenance down-time for each system.

**Disputed Issues 9, 16,
19, 20, 21, 24 and 40:**   **Interface Development Rule – Detailed Specification Requirements**

Statement of Issue: **SBC/Ameritech has failed to provide the specific business rules and specifications necessary to evaluate its proposed improvements to its OSS, which is the crux of what was required for this Phase II. Without this information, CLECS do not know whether SBC/Ameritech is implementing the system functionality prescribed by industry standards. SBC/Ameritech must be required to provide specific information regarding the interfaces, and**

CLECs should have the right to arbitrate remaining disputed issues related to those details.

Competitive
Ramifications: SBC/Ameritech has failed to provide the specifications needed by the CLECs to effectively evaluate its proposed OSS improvements. Such specifications should have been provided during the OSS collaboratives, which would have allowed a robust discussion of the proposals. By failing to make the specifications available, SBC/Ameritech has foreclosed this opportunity. It is imperative that the CLECs have a meaningful opportunity to address their concerns. Without the ability to timely and effectively challenge the specifics of SBC/Ameritech's OSS improvements, the protections afforded CLECs by Condition 29 of the Commission's merger order would be lost and CLECs would be unable to obtain a timely resolution of any disputed issues.

Paragraph 29 of the Commission's merger conditions requires SBC/Ameritech to implement enhancements to its OSS "as defined, adopted, and periodically updated by industry standard setting bodies for OSS that support pre-ordering, ordering, provisioning, maintenance and repair, and billing for resold services, individual UNEs, and combinations of UNEs." Order, p.259, Docket 98-0555. These enhancements were to be designed and implemented in three phases. In Phase I, SBC/Ameritech submitted its POR, which was initially rejected by the Commission.[16] In Phase II, SBC/Ameritech was to work collaboratively with the Staff and CLECs to obtain written agreement on OSS interfaces,

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[16] It is significant to note that when SBC/Ameritech first presented its POR to the Commission, numerous CLECs objected to it as fundamentally lacking in the specificity needed for a full evaluation. The Commission agreed and rejected the POR on the basis that it was appallingly vague. (Cross Ex. 3) Although the revised POR was ultimately approved by the Commission, it still lacks the needed specifics to fully evaluate and understand SBC/Ameritech's plans. (AT&T Initial Comments, AT&T Ex. 4, pp. 15-21)

enhancements and business requirements identified in the POR. Those issues that could not be resolved are to be resolved in this arbitration. At the conclusion of Phase II, implementation, or Phase III, is to begin. (AT&T Initial Comments, AT&T Ex. 4, pp. 15-16)

The merger order required SBC/Ameritech to work with CLECs in the Phase II collaborative to "obtain written agreement on OSS interfaces, enhancements, and business requirements identified in the POR." SBC/Ameritech has not done so. SBC/Ameritech has not provided the business rules and specification level detail necessary for the CLECs to understand SBC/Ameritech's OSS plans, and thereby come to "agreement" on interfaces, enhancements and business requirements.

Without a complete set of business rules, process flows and specifications for SBC/Ameritech's planned enhancements, the CLECs and the Commission are unable to determine what the proposed interfaces, enhancements and business requirements actually include. CLECs require this level of information to build their systems and to operate on their side of the interfaces.[17] (AT&T Comments, AT&T Ex. 4, pp.16-17) SBC/Ameritech's testimony confirms this point. SBC/Ameritech witness Mr. Gilles testified that a CLEC would not know whether SBC/Ameritech is following industry standards and guidelines until SBC/Ameritech releases its specifications for the March 2001 releases, which is scheduled to occur on October 13, 2000. (Tr. 129, 142) Indeed, Mr. Gilles was unable to commit that the business rules and specifications will comply with industry standards. (Tr. 141-42) In the absence of specification-level detail, and given Mr. Gilles'

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[17]Any deviation from specifications or business rules can result in a reject or other failure of the transaction. Thus, in order to build its systems, to operate on its side of the interface, a CLEC must have this level of information. (AT&T Initial Comments, AT&T Ex. 4, pp.16-17)

testimony, CLECs are in no position to accept the POR, much less to design and build pre-ordering and ordering systems of their own. CLECs are left without the information necessary to determine whether SBC/Ameritech plans to provide system functionality that complies with industry standards.

Moreover, SBC/Ameritech has provided vague and sometimes contradictory explanations in regard to the level of commitments that it has included in the POR. For example, with regard to its plans to improve its flow through capabilities, SBC/Ameritech has only stated that it intends to "improve" flow through for certain order types. It has provided no detail as to what these "improvements" will include. See Issue 18, below. Similarly, Mr. Gilles testified that SBC/Ameritech intends to change the format of the CSR, but could not describe in detail the specifications of this change. (Tr. 150) Finally, although SBC/Ameritech originally agreed to make relaxed validation available by December 2000, it has now pushed that date back to March 2001. See Issue 13, below. This inattention to detail or consistent revision in plans seriously impacts the usefulness of the POR.

The crux of this issue is how open issues regarding specifications and business rules related to the proposed enhancements will be resolved if Phase II ends and Phase III begins. SBC/Ameritech has requested that the CLECs sign off on the POR even though it does not provide the specifications and business rules needed to evaluate the proposed improvements, and leave the resolution of disputed issues arising from yet unknown specifications for interface changes to the Change Management Process. (SBC/Ameritech Initial Comments, Amer. Ex. 15, p. 35) This result is unacceptable to the Joint Small CLECs for two reasons.

First, it does not provide the same timely and effective relief as that afforded by the merger conditions. Under Condition 29 of the merger order, CLECs have a right to arbitrate before the Commission any OSS system changes on the grounds that they do not conform to the industry standard as well as the right to arbitrate whether SBC/Ameritech's implementation is compliant. Order, pp. 260-261, Docket 98-0555. Adoption of SBC/Ameritech's proposal would essentially prevent the Commission from addressing questions regarding specifications and business rules until after they are implemented, even if the CLECs know there are problems with the business rules once they are released.[18] (Tr. 130-32) Second, the CMP does not provide for resolution of issues arising from underlying business rules that are governed by specifications. (Tr. 182-83) Neither does it provide for CLEC proposed changes to OSS. (Tr. 154)

The CLECs' proposal overcomes these problems and offers a reasonable procedure. Under the proposal, once SBC/Ameritech presents the specifications and business rules for its systems enhancements, it should simultaneously provide a document that maps those specifications to the relevant industry standards.[19] Thereafter, SBC/Ameritech and the CLECs would proceed to expedited collaborative discussions. Any

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[18]The business rules for the March 2001 releases will be available in October. (Tr. 129) Thus, if SBC/Ameritech's position were adopted, the CLECs would have to wait from October until March to file for relief from the Commission. (Tr. 129-32)

[19]The CLEC proposal includes a document in which the detailed data elements for each of the forms, each of the inquiry responses and each of the inquiry components of both pre-order and order would be mapped to show its relationship as defined by SBC/Ameritech to the standard as published by the Ordering and Billing Forum and would also relate that data element to its particular place in the form in which it is being used. (Tr. 171-72)

remaining disputes would be subject to arbitration under the arbitration procedures set forth in Condition 29 with respect to Phase III.[20] (AT&T Initial Comments, AT&T Ex. 4, p. 19)

Staff supports the CLECs' position that, had SBC/Ameritech been forthcoming regarding detailed specifications and business rules for OSS during the collaborative process, the CLECs would have had the right to arbitrate any such matters. Staff notes that SBC/Ameritech did not do so despite the Chairman's admonition in his February 17th letter (Cross Ex. 3), and despite the matter having been raised during the collaborative process. Staff characterizes SBC/Ameritech's position as an effort to foreclose the CLECs' right to arbitrate. (Staff Initial Comments, Staff Ex. 2, p. 25)

According to Staff, Condition 29 specifically affords the CLECs the remedy of arbitration. Arbitration is the Illinois-sanctioned remedy, which the Illinois Commission has deemed the proper way to resolve OSS interface disputes. SBC/Ameritech's attempt to foreclose, by its own failures and omissions, the CLECs' right to arbitrate in favor of a Texas remedy it appears to prefer, should be rejected by the Commission. Since the CLECs have been denied the opportunity to arbitrate these issues in Phase II, they should be permitted to arbitrate them in Phase III. For all these reasons, Staff recommends that the Commission should adopt the CLEC proposed Interface Development Rule. (Staff Initial Comments, Staff Ex. 2, pp. 25-26)

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[20]Condition 29 provides in relevant part that: "If one or more CLECs contend that SBC/Ameritech has not developed and deployed the system interfaces, enhancements, and business requirements consistent with the written agreements contained in Phase II, or has not complied with the Commission's decision received in Phase II, the may file a complaint with the Commission which shall arbitrate the issues consistent with the procedures identified in Phase II except that this arbitration shall be concluded within two months."

Accordingly, the Commission should adopt the CLEC and Staff proposal and make clear that once SBC/Ameritech releases its initial specifications for the March 2001 releases, the CLECs may initiate a Phase II arbitration if they believe those specifications conflict with the commitments SBC/Ameritech has made in the revised POR or the applicable industry standards. While the CLECs are willing in effect to put the specified issues on hold pending publication of the specifications, they are not willing to concede that SBC/Ameritech's POR is adequate on these issues.

Disputed Issue 11:	**Retain Current Listings**
Statement of Issue:	**SBC/Ameritech has agreed to provide a process to retain the current listing for UNE orders other than partial migrations. The CLECs require a similar process for partial migrations.**
Competitive Ramifications:	**Requests for partial migrations require a CLEC to place an additional order with SBC/Ameritech's advertising affiliate, which processes the orders manually. Such a process delays the CLEC's ability to respond to its customers and increases the likelihood of human error.**

A partial migration occurs when a customer migrates only a portion of the lines on its account to another carrier, as opposed to a full migration, which entails a conversion of the customer's entire account (all telephone numbers). (SBC/Ameritech Initial Comments, Amer. Ex. 15, p. 63) In the event of a partial migration, the CLEC must place a second order with Ameritech's publishing affiliate, Ameritech Advertising, Inc., in order to retain the current directory listing for the migrated lines. While these types of matters can be completed without customer input, under SBC/Ameritech's process, partial migration is

subject to manual intervention and does not flow through. (CoreComm Initial Comments, CoreComm Ex. 2, p. 17; Tr. 1022-23) Thus, additional delays are incurred and there is a greater risk of error.

CLECs require the ability to retain current listings on partial migrations without having to place a second call to Ameritech Advertising, Inc. for several reasons. First, the current process of separately placing directory listings with Ameritech's publishing affiliate injects needless complexity to the process of provisioning partial migration orders. More importantly, the process injects the additional potential for human error and omission. Placing directory listing orders for partial migration through EDI would eliminate these concerns. (CoreComm Initial Comments, CoreComm Ex. 2, p. 18)

SBC/Ameritech claims that it cannot support retention of current listings for partial migrations because to do so would break up the account relationship between a primary listing and the additional listings associated with the primary listing. (SBC/Ameritech Initial Comments, Amer. Ex. 15, p. 64) This explanation does not make sense in those instances when the CLEC customer does not want the listing changed for the migrated lines. (See Tr. 1027-32) In any event, SBC/Ameritech's explanation does not excuse its unwillingness to enhance its OSS in a way that benefits competitors.

The Commission must order SBC/Ameritech to support retention of directory listings for partial migrations without the need for additional calls and manual intervention.

Disputed Issue 13:	**Customer Service Record Address Validation (Lite Edit)**
Statement of Issue:	**When a CLEC order is received by SBC/Ameritech, validation rules are applied to the address fields on the order. Orders are often rejected if the address is not identical to the corresponding address in SBC/Ameritech's data base. SBC/Ameritech currently proposes to relax the address validation rules for resale, UNE-P, loops with number portability and line sharing, by March 2001. CLECs would like the functionality implemented earlier than March 2001, and for all orders.**
Competitive Ramifications:	**SBC/Ameritech's address validation procedure is onerous and causes rejects for minor address differences. The rejection notice also does not include a listing of the error. CLECs must guess the correct address abbreviation and try again. This hit-or-miss system is inefficient and unacceptable. The sooner relaxed validation is implemented, the sooner unnecessary order rejects will be reduced, and CLEC end use customers will receive service on a more timely basis.**

Both SBC/Ameritech and the CLECs agree that SBC/Ameritech's OSS validation process should be relaxed such that an address need not be provided for CLEC orders. However, SBC/Ameritech's proposal to relax the order validation process does not apply to all orders and is being implemented too late. The Commission should require SBC/Ameritech to expand the orders to which relaxed validation applies and require relaxed validation to be implemented by no later than the end of 2000.

A.   Introduction

The evidence establishes that the most frequent reason that SBC/Ameritech rejects CLEC orders is because the street address provided by the CLEC does not match the

street address against which SBC/Ameritech validates the order. Indeed, industry-wide, approximately 35% of all orders reject for this reason.[21] If the street address provided by a CLEC does not match the street address against which SBC/Ameritech validates an order either in form (e.g., the spacing of the street address) or in content (e.g., "St." versus "Str."), the order will reject. (AT&T Initial Comments, AT&T Ex. 4, pp. 25-29) This occurs even if the address is technically correct. (Covad Initial Comments, Covad Ex. 2, p. 3)

In the pre-ordering process, SBC/Ameritech provides CLECs access to the customer service record ("CSR") database, which includes information regarding the customer (e.g., directory listings, street address, telephone number, features and services ordered by the customer). CLECs use the information in the CSR to populate the fields of the order that must be provided to SBC/Ameritech. In addition, SBC/Ameritech provides CLECs access to the Ameritech Street Address Guide ("SAG") database. The SAG includes valid street addresses in the Ameritech region. The address information contained in these two databases does not always match in format and content. (AT&T Initial Comments, AT&T Ex. 4, pp. 25-29) For example, the actual addresses or abbreviations used may differ. Thus, one may include "Str." while the other includes "St." as the address for a particular location. Obviously, both forms are technically correct, but only one will pass SBC/Ameritech's address validation process as it currently works.

In addition, the SAG address information is provided in a "fielded" format, while the CSR is not. When information is provided in a "fielded" format, each piece of information (the number, the street name, etc.) is provided in a specific place or "field" on the form.

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[21]This information became available in the FCC's SWBT Texas 271 investigation. (AT&T Initial Comments, AT&T Ex. 4, p. 25)

Because the SAG information is provided in discrete fields, it is provided in a format that can be cut and pasted by the CLEC into an order in the format required by SBC/Ameritech. Because the address information in the CSR is provided in a non-fielded manner, it may not be properly "spaced" or provided in the format required by SBC/Ameritech's ordering systems. If the CLEC were to copy the CSR address information into an order it could be rejected. (AT&T Initial Comments, AT&T Ex. 4, pp. 25-29)

When CLECs send an order to SBC/Ameritech, SBC/Ameritech requires that CLECs provide the street address of the end-user.[22] Depending on the type of order, SBC/Ameritech validates the order through either the CSR or the SAG. SBC/Ameritech's systems compare the telephone number and address on the order to the telephone number and address in the customer service record. The address check assures that the order is posted to the correct customer record. (AT&T Initial Comments, AT&T Ex. 4, pp. 25-29)

When a reject occurs, the CLEC must attempt to discern which portion of the address did not match the customer record address. Once it makes that determination, it must manually resubmit the order. There is no guarantee that the resubmitted order will not be rejected. This is because SBC/Ameritech does not inform the CLEC as to the correction that needs to be made; it merely informs the CLEC which field has an erroneous entry. (Tr. 735-37) Manual re-submission of orders also introduces many additional steps that must be performed by the CLEC and, with each step, the CLEC must guess how the

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[22]This is consistent with the OBF industry ordering guidelines. (Tr. 784) However, it should be noted that while the guidelines require inclusion of an address on an order, other ILECs do not so require. In addition, relaxed validation could be implemented in a manner that addresses are required but their validation does not impact order rejection.

address is stored in SBC/Ameritech's SAG, creating an additional opportunity for error (and additional rejections) to occur. Each additional submission requires the use of additional CLEC resources and results in additional delay in the date on which the CLEC's customer receives service. (AT&T Initial Comments, AT&T Ex. 4, pp. 25-29; Covad Initial Comments, Covad Ex. 2, p. 4)

Relaxed or "lite" validation would allow CLEC orders to be verified based on the customer's telephone number, and not its address, because the address entry becomes optional.[23] (Tr. 766-67) This form of validation avoids the many pitfalls inherent in the current validation process -- which stem from the fact that there are numerous ways to properly state a valid address -- and results in fewer CLEC orders being rejected. Because it only requires that ten numbers be input, the likelihood of errors in the order decreases substantially, which results in fewer rejected orders. (AT&T Initial Comments, AT&T Ex. 4, pp. 25-29)

During the collaborative process, SBC/Ameritech committed to offer CLECs "lite" address validation on migration orders for resale, UNE-P and loops with number portability. SBC/Ameritech refused, however, to allow CLECs to submit orders for unbundled loops and line shared loops using "lite" address validation. However, during the pendency of this proceeding, SBC/Ameritech modified its position to allow lite validation for line sharing orders. (Tr. 725-728; Covad Initial Comments, Covad Ex. 2, p. 4) Why orders for unbundled loops continue to be left off the list that qualify for "lite" address validation is

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[23]SBC/Ameritech has not yet provided the specifics as to its current relaxed validation proposal, and could not indicate whether an address could be provided with the order, the validation of which would not cause order rejection. (Tr. 724-25, 749-51)

unclear. Orders for unbundled new loops flow through the same OSS gateways and backend systems as orders for line shared loops.

B.   Scope of Orders to Which Relaxed Validation Would Apply

SBC/Ameritech has only offered "lite" validation for certain CLEC orders and has not yet provided to CLECs the business rules or detailed specifications of its proposal. (Tr. 750) Specifically, SBC/Ameritech has now committed to offer "lite" validation for orders that migrate an existing SBC/Ameritech customer to a CLEC using resale, combinations of UNEs, unbundled loop/number portability and line sharing. Significantly, the proposal excludes all orders for new unbundled loops. (AT&T Initial Comments, AT&T Ex. 4, pp. 25-29) SBC/Ameritech claims that it is offering "lite" validation for only "migration" orders or changes to an existing service, but not for "new service." (Tr. 711) However, SBC/Ameritech is offering "lite" validation for line sharing and it considers line sharing a new service. (Tr. 725) Thus, SBC/Ameritech's proposal is internally inconsistent. Thus, SBC/Ameritech's proposal is internally inconsistent. There is no basis for this artificial distinction between migration of service and new service. Moreover, SBC/Ameritech's change of position establishes that "lite" address validation could easily be applied to orders for new service.

The deficiency of SBC/Ameritech's proposal is best illustrated by an example. If an SBC/Ameritech customer with a single line decides to add a CLEC DSL loop to connect to the Internet, the CLEC order would continue to have to meet the overly rigorous address validation process for the order to not be rejected. However, if that same customer were to have two SBC/Ameritech lines and then cancel one and replace it with a CLEC DSL

loop, that order would be deemed a migration, and lite validation would apply.[24] In both

cases, SBC/Ameritech had accurate address and telephone number information about the

end use customer in its OSS systems. (Tr. 717-23) The lite validation process should be

applicable to both these scenarios.

It is more reasonable to validate based on the customer's phone number than its

address since there is only one way to state a phone number, but multiple ways to state

an address. In other words, there can only be ten digits to a phone number. (Tr. 702) On

the other hand, there are multiple ways to specify any particular address, all of which would

be technically correct for all purposes other than validation on SBC/Ameritech's databases.

(Tr. 705-06) SBC/Ameritech should have no opposition to use of the customer's phone

number for order validation purposes, since the phone number is used by SBC/Ameritech

for retail purposes. For example, if a retail customer calls SBC/Ameritech to order

additional service, SBC/Ameritech identifies the customer by its telephone number. (Tr.

707)

SBC/Ameritech will likely argue that lite validation is not as pressing a change as it

once was because of the improvements made to SBC/Ameritech's address validation

transaction to include validation through the living unit database during the pre-ordering

process. However, the record indicates that while improvements have been made in the

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[24]This situation is similar to line sharing, where the customer obtains voice service from
SBC/Ameritech, but data service over the high frequency portion of the loop from a CLEC.
In such a case, SBC/Ameritech is willing to allow lite validation on the basis that the line
sharing service "rides the existing line" so there is no "potential confusion about where the
service would be provided." (Tr. 728-29) There simply is no practical or relevant difference
between the line sharing scenario and the provision of a new loop where the customer
continues to obtain phone service from SBC/Ameritech.

pre-ordering process, it nevertheless remains a possibility that the address will be rejected in the ordering process due to the translations needed to fill in the address fields in the ordering form. (Tr. 740-41)

SBC/Ameritech is not the only ILEC to be faced with address validation problems. Its Texas ILEC affiliate, SWBT, determined to implement a relaxed form of validation as part of its 271 approval process. The evidence shows that once relaxed validation was implemented, WorldCom's rejection rate dropped from an outrageously high 50% to less than 20%. (Tr. 761-65) While SBC/Ameritech attempted to distinguish the situation in Texas from the present situation in Illinois, its expert reluctantly admitted that there is probably some correlation between WorldCom's reject rate decreasing and lite validation being introduced. (Tr. 765)

The Commission must also recognize that SBC/Ameritech's inadequate proposal fails to eliminate the root cause of the problem: the conflict between the databases from which CLECs retrieve customer addresses. Other ILECs have addressed this same problem. For example, Verizon deployed an upgraded system including a full synchronization of street address records and customer service records. The synchronization of the two data bases was engineered using the hypothesis that the CSR was more likely to be incorrect than the SAG, since the customer service records were, in many cases, established prior to the ILEC's decision in the early 1980s to begin to verify orders for new service locations against the SAG. Discrepancies between CSRs and SAG entries were resolved by replacing the CSR address with the SAG address applying a one-time scrub of the databases. This process can and should be done by SBC/Ameritech. (AT&T Initial Comments, AT&T Ex. 4, pp. 25-29)

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C. Timing of Implementation of Relaxed Validation

The POR which is the subject of this proceeding currently reflects that SBC/Ameritech has offered to implement a limited form of "lite" validation by December 2000. (Jt. Pet., Ex. 2, p. 11) In its initial comments, and again at the hearing, SBC/Ameritech informed the parties that it no longer is willing to implement lite validation by December 2000. (See Tr. 768-69) A December 2000 implementation date is not soon enough. The newly delayed date of March 2001 is even more unacceptable.

SBC/Ameritech agreed to implement lite validation in December 2000.[25] In the eleventh hour, SBC/Ameritech changed its mind and slipped the date back by three months. (Tr. 768-69) It is not clear what prompted SBC/Ameritech to conclude at the last minute that it could no longer do what it had committed to the CLECs and Staff that it would do (see Tr. 768), but any reason it may now offer will be disingenuous at best. SBC/Ameritech could implement this change by the end of the year, if it were required to do so. The evidence shows that its affiliate, SWBT, implemented lite validation in Texas within 30 days. Its decision to do so was based on its desire to obtain 271 authority. (Tr. 771-72) While SBC/Ameritech is not seeking such authority here, and therefore has no real incentive to implement this change quickly, the Commission should nevertheless hold SBC/Ameritech's feet to the fire and require it to implement this necessary OSS change by no later than the end of the year.

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[25]In fact, SBC/Ameritech originally proposed a September 2000 implementation date. During the collaborative process, that date was moved back to December 2000. (Tr. 778-79)

Importantly, the evidence is clear that approximately 35% to 40% of orders are rejected based on faulty addresses. (AT&T Initial Comments, AT&T Ex. 4, p. 25; see e.g. Tr. 788-90, 792-95) This is clearly a significant problem. The evidence further demonstrates that relaxed validation will significantly improve the problem. (Covad Initial Comments, Covad Ex. 2, p. 4; Tr. 800) The sooner it is implemented, the better for competition. As Rhythms' expert Brian Baltz testified:

> [B]y pushing that release out, we are not engaging in light validation. That means that we are going to experience a reject rate of 35 to 40 percent for an additional 90 days. That means that we are not going to be able to offer service to our end users in a reasonable cycle time. So it's critical that validation is released as quickly as possible. . . . You always have the ability to correct the rejects, but the goal would be to eliminate the reject and allow that order to flow correctly the first time through.

(Tr. 798-99) While the CLECs do not believe December 2000 is soon enough, it is exceedingly better than the new implementation date of March 2001 now proffered by SBC/Ameritech.

D.   Conclusion

In order to ensure that CLEC orders are not being inappropriately rejected, i.e., rejected when the correct phone number is provided, the Commission should require SBC/Ameritech to offer "lite" validation for all order types by no later than the end of the year. In the long term, the Commission should require SBC/Ameritech to eliminate the cause of this problem by synchronizing the data included in the SAG and CSR.